



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

*Strategic Policy Management Branch  
800 Independence Ave SW  
Washington, DC 20591*

April xx, 2022

Catherine Downen  
ODA Enterprise Program Administrator - TC  
500 Gulfstream Road  
M/S R-07  
Savannah, GA 31407

SENT VIA EMAIL

Dear Catherine Downen:

The Federal Aviation Administration (FAA) has received your petition letter no. G-CAO-22-100395, dated March 10, 2022, requesting an amendment to exemption no. 10188A, to add relief from the requirements of title 14, Code of Federal Regulations (14 CFR) § 25.813(e) for the Gulfstream Model GVIII-G800 airplane. This exemption, if granted, would provide relief from the requirement that no door may be installed between any passenger seat that is occupiable for take-off and landing and any passenger emergency exit, such that the door crosses any egress path (including aisles, crossaisles and passageways).

Your request was posted to the Department of Transportation's Federal Docket Management System in Docket No. FAA-2010-0446 (at Regulations.gov) on March 13, 2022. Our office has reviewed your petition and has determined that more information is needed from Gulfstream Aerospace Corporation before we can process your request for exemption. Specifically we need the following:

1. The requested relief is for the Model GVIII-G800 airplane, however it is the FAA's understanding the GVIII-G800 is a marketing name and not the name that will be on the Type Certificate Data Sheet (TCDS). Please clarify and provide a revised petition for exemption with the official name that will be on the TCDS that will align with the certification basis in lieu of the marketing name.
2. Please elaborate further on how this request does not adversely affect safety, and how it provides a level of safety at least equal to that provided by the rule as noted in section 11.81(e)
3. Please elaborate further on how this request is in the public interest per section 11.81(d).
4. Clarify what is being requested with regards to the EASA referenced information. The regulations mentioned, § 25.813 (e) and Certification Specification (CS) 25.813(e) do not appear on the EASA Significant Standard Differences List. Please clarify if Gulfstream is trying to address § 11.81(h) with this information. If that is the intent can Gulfstream please provide additional information as noted in the regulation 11.81(h).

5. Please address the regulatory amendment differences. Under “Factors Supporting the Petition” Gulfstream references the features are identical to those described in Exemption 10188. Exemption 10188 is for § 25.813(e) at amendment 25-116, the GVIII-G800 (1) is at amendment 25-128.
6. Please address the differences in this request versus Exemption 10188 for the following item under Factors Supporting the Petition. Exemption 10188 notes that the GVI has Emergency exit locator and marking signs and emergency lighting in accordance with §§ 25.811 and 25.812. However this request notes the emergency exit locator, marking signs, and emergency lighting provided comply with the criteria defined in ELOS AT5177AT-T-C-1 (ELOS to §§ 25.811(d) and 25.812(b)). Please provide information showing how the ELOS for the emergency lighting does not affect or change the equivalency of the request. Please address how the cumulative effect of the two ELOS combined do not affect safety.
7. Please provide the differences in this request versus Exemption 10188 for the following item under Additional GVIII-G800 Design Considerations. Exemption 10188 notes the GVI aircraft complies with § 25.807 (g) for required number of emergency exits and § 25.807(i) for ditching. However this request notes that there is an ELSO TC8700AT-T-C-1 for §§ 25.807(a)(3) and 25.807(g)(2)(3) for emergency exits and § 25.807 (g) (i)(2) for ditching. Please provide information showing how the ELOS for emergency exits and ditching does not affect or change the equivalency of the request. Please address how the cumulative effect of the two ELOS combined do not affect safety.

Please provide the requested information within 30 days of the date of this letter by submitting it to the established docket (FAA-2010-0446) at [regulations.gov](http://regulations.gov). If the additional information is not submitted within that timeframe, the agency will cease work on the project with no further correspondence to you. Please note that work will only resume when the FAA receives the additional information. If Boeing considers any of the additional information to be proprietary, mark the material as “PROPRIETARY” and submit it directly to the FAA addressed to the person below.

If you have any questions or concerns regarding your petition or the petition process, please contact Myra Kuck at (405) 666-1059, or by email at [myra.j.kuck@faa.gov](mailto:myra.j.kuck@faa.gov).

Sincerely,

Mary A. Schooley  
 Section Manager, Aircraft Systems  
 Strategic Policy Management Branch  
 Policy and Innovation Division  
 Aircraft Certification Service